

 **BELLSOUTH**  
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2003 JUL 10 PM 4:06  
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July 10, 2003

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VIA HAND DELIVERY

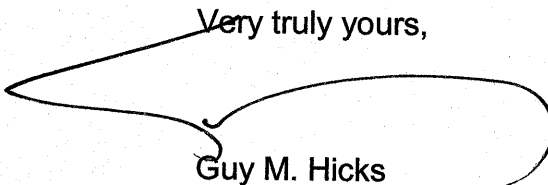
Hon. Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Docket to Establish Generic Performance Measurements, Benchmarks  
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*  
Docket No. 01-00193

Dear Chairman Tate:

Consistent with BellSouth's letter to the Authority dated November 15, 2002, enclosed are fifteen copies of the Industry Task Force Report Concerning New Measure P-11 (Service Order Accuracy). Copies of the cover letter sent to the Georgia Public Service Commission are also enclosed. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch



**BellSouth Telecommunications, Inc.**

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June 12, 2003

**DELIVERED BY HAND**

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334-5701

Re: *Performance Measurements for Telecommunications Interconnection,  
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

Enclosed herein are an original and seventeen (17) copies, as well as an electronic version, of the Industry Taskforce Report Concerning New Measure P-11 (Service Order Accuracy) in the above-referenced docket. I would appreciate your filing same and returning the two (2) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this regard.

Yours very truly,

  
Bennett L. Ross

BLR:nvd  
Enclosures

cc: Mr. Leon Bowles (via electronic mail)  
Mr. Patrick Reinhardt (via electronic mail)  
Parties of Record (via electronic mail)

494327/493878

**BEFORE THE  
GEORGIA PUBLIC SERVICE COMMISSION**

In Re:

Performance Measurements for  
Telecommunications Interconnection,  
Unbundling and Resale

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Docket No. 7892-U

**INDUSTRY TASKFORCE REPORT CONCERNING  
NEW MEASURE P-11 (SERVICE ORDER ACCURACY)**

**I. INTRODUCTION**

On February 20, 2003, BellSouth Telecommunications, Inc. ("BellSouth") filed an emergency motion concerning new performance measure P-11 (Service Order Accuracy), which requires that BellSouth's service order accuracy performance be calculated based upon a mechanized review of all partially mechanized Local Service Requests ("LSRs"). Because of technical and practical problems encountered in implementing this new measure, BellSouth's Motion requested, in part, that the Commission establish an industry taskforce to examine these issues and report back to the Commission at a later date. The Commission granted BellSouth's Motion in an order entered on April 17, 2003.

An Industry Taskforce was established, consisting of representatives of BellSouth, AT&T Communications of the Southern States, LLC, MCI WorldCom, Inc, ITC DeltaCom, Inc., Covad Communications, Inc., and Birch Telecom of the South, Inc. Staff members from the Florida and Georgia Public Service Commissions also participated. The industry taskforce met six times between March 12, 2003 and May 27, 2003. Consistent with the Commission's April 17, 2003 Order, the Industry Taskforce respectfully submits this Report.<sup>1</sup>

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<sup>1</sup> The Commission directed the Industry Taskforce to submit its Report within sixty (60) days of its first meeting, which was March 12, 2003. This deadline was extended to June 12, 2003, at the taskforce's request.

## **II. EXECUTIVE SUMMARY**

The Industry Taskforce agrees that, consistent with the Commission's November 14, 2002 Order, BellSouth's service order accuracy performance should be calculated based upon a review of all partially mechanized LSRs, rather than using a statistically valid sample of certain types of LSRs. However, in order to more precisely capture BellSouth's service order accuracy performance, the Industry Taskforce recommends that the new performance Measure P-11 previously adopted by this Commission be modified. These recommended modifications include: (1) eliminating certain LSR fields from the new P-11 measure and clarifying other fields captured in this measure; (2) excluding from the measure any differences in the LSR and the service order that are attributable to Local Carrier Service Center ("LCSC") or system workarounds as well as establishing a process by which those workarounds can be identified and discussed; and (3) discontinuing BellSouth's practice of correcting minor formatting errors on LSRs submitted by Competing Local Exchange Carriers ("CLECs"). Each of these proposed modifications is discussed in greater detail below, and the modified Measure P-11 as proposed by the Industry Taskforce is attached as Appendix 1.

Assuming the Commission agrees with the Industry Taskforce's recommendation and adopts the modified Measure P-11 as proposed, the Industry Taskforce requests that BellSouth be directed to implement the modified measure with September 2003 orders. This would result in partially mechanized LSRs generated in September 2003 being reviewed consistent with the modified Measure P-11, with service order accuracy performance being reported under this measure with October 2003 results.

### **III. DISCUSSION**

#### **A. Elimination And Clarification Of LSR Fields**

In response to the problems encountered by BellSouth in developing the code necessary to capture fields on the LSR as part of a mechanized review process, the Industry Taskforce recommends that three fields originally ordered by the Commission be eliminated from the new P-11 measure. These three fields are: the Application Date, the Due Date, and the Remarks fields. The rationale for the Industry Taskforce's recommendation to eliminate these fields is as follows:

First, the Application Date is not a meaningful field for purposes of service order accuracy and presents problems in reporting service order accuracy performance. For example, an LSR submitted by a CLEC may have multiple versions, in which case the Application Date field on the LSR may not match the corresponding field on the service order. As a result, when comparing an LSR with multiple versions and the actual service order, a variance in the Application Date field is likely to occur, indicating that the service was provisioned inaccurately, which may not be the case at all. Elimination of the Application Date field from the new P-11 Measure avoids the problem encountered with multiple LSR versions.

Second, the Due Date field on the LSR and the corresponding field on the service order may not match for reasons entirely beyond BellSouth's control. This is because the Due Date field on the LSR represents the requested due date sought by the CLEC, while the Due Date field on the service order is the date service will be provisioned consistent with BellSouth's standard intervals. BellSouth should not be penalized if a CLEC populates the Due Date field on the LSR using an interval that is different than BellSouth's standard provisioning intervals, which would be the case if the Due Date field were part of the new P-11 measure.

Third, the Remarks field on an LSR is a free-flowing field that can be populated by the CLEC in numerous ways. Because this field will rarely, if ever, match identically the Remarks field on the service order, the Industry Taskforce recommends that this field be eliminated from the new P-11 measure.

The Industry Taskforce also recommends that the Feature Detail field be clarified to limit the specific USOCs and FIDs that will be reviewed in calculating service order accuracy performance. Because the Feature Detail field consists of floating identifiers and characters that are difficult, if not impossible to compare accurately and completely, the Industry Taskforce has agreed that, at the present time, only eleven (11) USOCs should be monitored to check feature detail accuracy. These eleven (11) USOCs are identified in the modified new P-11 measure as proposed by the Industry Taskforce attached to this Report as Appendix 1. The corresponding FIDs will be posted on the BellSouth's Interconnection website, and any necessary changes to these FIDs will be updated on the website. The specific USOCs to be reviewed in the context of the Feature Detail field should be evaluated on an on-going basis as part of the Commission's periodic review of the Service Quality Measurement ("SQM") Plan.

Finally, the Industry Taskforce recommends that the new P-11 measure be modified to make clear that the fields subject to this mechanized process will only be reviewed to the extent such fields are "service affecting." In other words, to the extent a particular field populated on an LSR does not match the corresponding field on the service order, but the service order has been provisioned correctly, this field would not be "service affecting" and would not be included in the new P-11 measure. Language to this effect is included in the modified new P-11 measure attached as Appendix 1.

## **B. LCSC And System Workarounds**

One of the most contentious issues addressed by the Industry Taskforce concerned LCSC and system workarounds. BellSouth believes that these workarounds facilitate the ordering and provisioning of CLEC services but complicate the calculation of service order accuracy. For example, certain edits have been established in BellSouth's system to enhance the provisioning process, such as is the case with the calling scope USOC for the UNE-P. Similarly, certain partially mechanized LSRs fall out by design for manual handling by the Local Carrier Service Center, which is triggered when the CLEC populates a particular field in a particular manner. After the LSR falls out to the LCSC, the BellSouth service representative makes changes to these fields so that the order can be successfully provisioned by BellSouth's downstream systems. In such cases, when the LSR submitted by the CLEC and the service order generated by the BellSouth are compared, there will be differences in particular fields, which does not necessarily mean that the order was provisioned inaccurately.

On the one hand, if included in the calculation of service order accuracy results, BellSouth would have little choice but to discontinue the use of such workarounds. However, doing so would require extensive operational changes and would delay the ordering and provisioning process for CLECs and their end user customers. On the other hand, BellSouth can continue the use of these workarounds while implementing coding logic to ensure that these workarounds are not captured in calculating BellSouth's service order accuracy performance. The Industry Taskforce recommends this latter approach.<sup>2</sup>

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<sup>2</sup> It is the CLECs' position that BellSouth should not make changes to their LSRs and thus believe that any underlying causes for workarounds should be corrected as quickly as possible. The CLECs have requested that BellSouth provide a schedule for correcting the underlying causes of existing workarounds so that its LSRs do not have to be changed by BellSouth in order to be processed. BellSouth has only responded in part to this request (see Appendix 2). However, in order to avoid further delay in implementing this measure, the CLECs will defer this issue until the next six-month review.

The Industry Taskforce recognizes that the use of LCSC and system workarounds are dynamic, particularly since new workarounds may be added after a system release and as any system related errors that must be corrected are detected. However, the Industry Taskforce also believes that the workaround processes as they related to service order accuracy should be transparent to the Commission and the industry. Accordingly, the LCSC and system workarounds that are not being captured in the new P-11 measure should be identified in a matrix that is posted and maintained on BellSouth's Interconnection website, the current version of which is attached as Appendix 2. In addition, any question or concern about a particular workaround may be addressed during the monthly PMAP notification industry conference calls.

**C. BellSouth's Correction Of Minor Formatting Errors**

Currently, when confronted with an LSR that contains a minor formatting problem, BellSouth's LCSC representatives are trained to fix the problem rather than clarifying the LSR back to the CLEC. Obviously, if the BellSouth LCSC representative makes a change to one of the fields subject to this new mechanized process, the LSR submitted by the CLEC and the service order generated by the service representative would be different. This would result in a finding that the service order was "inaccurate," even though the CLEC may have received the exact service it wanted. In light of such circumstances, the Industry Taskforce believes that BellSouth should direct its service representatives to stop correcting problems on the LSRs, no matter how minor, even though doing so will cause a greater number of LSRs to be clarified back to the CLECs.



#### **IV. CONCLUSION**

For the foregoing reasons, the Industry Taskforce respectfully recommends that the Commission adopt the modified P-11 measure that is attached as Appendix 1 to this Report and direct BellSouth to implement this modified measure with September 2003 orders.

Respectfully submitted, this 12<sup>th</sup> day of June, 2003.



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ON BEHALF OF THE SERVICE ORDER  
ACCURACY INDUSTRY TASKFORCE

**CERTIFICATE OF SERVICE**

**Docket No. 7892-U**

This is to certify that I have this day served a copy of the foregoing upon parties of record, by electronic mail and by depositing same in the United States Mail, with adequate postage thereon, addressed as follows:

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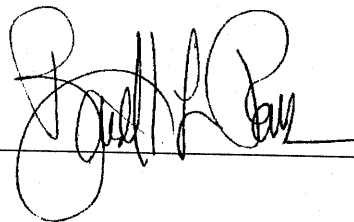
This 12<sup>th</sup> day of June, 2003.

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## P-11: Service Order Accuracy

### Definition

The Service Order Accuracy measurement measures the accuracy and completeness of CLEC requests for service by comparing the CLEC Local Service Request (LSR) to the completed service order after provisioning has been completed. Only electronically submitted LSRs that require manual handling by a BellSouth service representative in the LCSC are measured.

### Exclusions

- Canceled Service Orders
- Order Activities of BellSouth or the CLEC associated with internal or administrative use of local services (Record Orders, Listing Orders, orders using test OCN's, which may be coded C, N, R or T etc.)
- Disconnect Orders
- CLEC LSRs submitted manually (FAX or Courier)
- CLEC LSRs submitted electronically that are not manually handled by BellSouth (Flow Through)

### Business Rules

Only CLEC LSRs submitted electronically that fall out of the electronic system for manual processing (partially mechanized) by a BellSouth representative and the resulting service orders are selected for this measure. The CLEC requested services on the LSR are compared to the completed service order using the CLEC-Affecting Service Attributes shown below.

### Selected CLEC-Affecting Service Attributes

The BellSouth Local Service Request (LSR) fields identified below will be used, as applicable, for this Service Order Accuracy review process.

### BellSouth LSR Fields

The fields listed below would only be captured as a miss when they are service affecting. For the purpose of the Service Order Accuracy measure, if any of the fields listed below are populated on the LSR and do not match the corresponding field on the Service Order, but this mismatch does not affect the correct provisioning of the Service Order, the field is not considered to be service affecting and therefore will not be included as a miss in this measure. An example would be LCSC/System workarounds, which will be identified in a document posted on the Interconnection website. CLECs may discuss any of the posted LCSC/System Workarounds during the regular PMAP notification calls.

- Company Code
- PON
- Billed Telephone Number
- Telephone Number
- Ported Telephone Number
- Circuit ID
- PIC
- LPIC
- Directory Listing
  - Directory Delivery Address
  - Listing Activity
  - Alphanumeric Listing Identifier Code
  - Record Type
  - Listing Type
  - Listed Telephone Number
  - Listed Name, Last Name
  - Listed Name, First Name
  - Address Indicator
  - Listed Address House Number
  - Listed Address House Number Suffix

- Listed Address Street Directional
- Listed Address Street Name
- Listed Address Thoroughfare
- Listed Address Street Suffix
- Listed Address Locality
- Yellow Pages Heading
- Features
  - Feature Activity
  - Feature Codes
  - Feature Detail\*
- Hunting
  - Hunt Group Activity
  - Hunt Group Identifier
  - Telephone Number Identifier
  - Hunt Type Code
  - Hunt Line Activity
  - Hunting Sequence
  - Number Type
  - Hunting Telephone Number
- E911 Listing
  - Service Address House Number
  - Service Address House Number Suffix
  - Service Address Street Directional
  - Service Address Street Name
  - Service Address Thoroughfare
  - Service Address Street Suffix
  - Service Address Descriptive Location
- EATN
- ATN
- APOT
- CFA
- NC
- NCI

\* Feature Detail will only be checked for the following USOCs: GCE, GCJ, CREX4, GCJRC, GCZ, DRS, VMSAX, S98VM, S98AF, SMBBX, MBBRX. USOCs and FIDs for Feature Detail will be posted on the Interconnection Website. Any changes to the USOCs and FIDs required to continue checking the identical service will be updated on this Website.

## Calculation

Percent Service Order Accuracy =  $(a / b) \times 100$

- a = Applicable Orders Completed without Error
- b = Applicable Orders Completed in Reporting Period

## Report Structure

- CLEC Specific
- CLEC Aggregate
- Geographic Scope
  - Region

## Data Retained

### Relating to CLEC Experience

- Report Month
- CLEC Order Number (PON)
- Local Service Request (LSR) Number
- BellSouth Service Order Number

- BellSouth Service Order Completion Date
- Service Type (Resale, UNE, UNE-P)
- Standard Order Activity

**Relating to BellSouth Performance**

- No BellSouth Analog Exists

**SQM Disaggregation – Analog/Benchmark**

**SQM Level of Disaggregation**

**SQM Analog/Benchmark**

- Resale.....95% Accurate
- UNE.....95% Accurate
- UNE-P.....95% Accurate

**SEEM Measure**

SEEM	Tier I	Tier II	Tier III
Yes.....	X .....	X .....	

**SEEM Disaggregation - Analog/Benchmark**

**SEEM Disaggregation**

**SEEM Analog/Benchmark**

- Resale.....95% Accurate
- UNE.....95% Accurate
- UNE-P.....95% Accurate

### LCSC / System Workaround and Procedure Issue List

<i>Issue</i>	<i>Type</i>	<i>Procedure</i>	<i>Feature Number</i>	<i>Impl.</i>	<i>LSR</i>	<i>SO</i>
Billing Telephone Number BAN Field	System	The system is allowing the population of E in the BAN field, which is incorrect. The BAN field should be populated with a valid billing account telephone number.	14286	13.0	Field: BANI Entry: E	Field: BTN Entry: 404 QXXX- XXXX XXX
Listed Address	System	SYSTEM DEFECT (Electronic systems populating LATH data in all caps). LSRs are being clarified	Elms 6	14.0	Field: LATH Entry: AVE	Field: LA Entry: Ave
Feature Detail UNE NID Jack on LSR	System	The electronic system is not populating the USOC on service orders when it appears on the LSR	21421	TBD	Field: NIDR Entry: Various Jack USOCs	Field: S&E Entry: Various Jack USOCs
Directory Delivery Address DDA Default	System	On ACT N when DACT is not populated, the directory delivery name and address default from the fields on the EU [EU is what??] screen. Let's make sure we're still including this	24553	TBD	Field: DDA Entry: None	Field: DDA Entry: Same as SA.

<i>Issue</i>	<i>Type</i>	<i>Procedure</i>	<i>Feature Number</i>	<i>Impl.</i>	<i>LSR</i>	<i>SO</i>
		directory delivery info in our list of comparisons. EU is End user.				
Directory Delivery Address DDALO	System	The system formats the directory delivery name and address without the apt, suite or floor.	24553	TBD	Field: DDALO Entry: apt, suite or floor	Field: DDA Entry: Blank
Directory Delivery Address IDEL REQ TYP J ACT of C	System	The system is populating IDEL on all C orders. The reps are instructed to remove this when it appears on an order that has fallen out for manual handling and was not requested on the LSR.	24553	TBD	Field: None Entry: None	Field: IDEL Entry: RI IDEL
NC NCI DS1	System	CLECs populate the order with the incorrect NC NCI codes when going from a DS1 to a DS3. The order drops for manual handling and the reps populate the correct NC/NCI code.	No feature pending	TBD	Field: NC Entry: Various Field: NCI Entry: Various	Field: NC Entry: Various Field: NCI Entry: Various



<i>Issue</i>	<i>Type</i>	<i>Procedure</i>	<i>Feature Number</i>	<i>Impl.</i>	<i>LSR</i>	<i>SO</i>
Line Class of Service field	System	REQ TYP M ACT of C LNA of C. When the CLEC populates the line class of service in the feature detail section the system ignores	21692	TBD	Field: FA Entry: Not allowed	Field: S&E Entry:
Listed Name Titles and degrees	System	When a title or degree does not appear in the listed table the CLEC has been instructed to populate this information in the LNFN field on the LSR.	21387	TBD	Field: LNFN Entry: Various	Field: Listed Name Entry: None.
UNE-P Call Scope	Procedure	When an LSR is submitted for REQ M conversions, the system will look at the class of service and determine the correct class of service for UNE P. The system and the service rep will change the Class of service to the correct class of service per the UNE P call scope definition.	N/A	N/A	Field: FA Entry: Various USOCs for UNE-P classes of service	Field: S&E Entry: Various USOCs for UNE-P classes of service
ATN	Workaround	When the ATN for LNA of X is populated with the existing TN, BST is processing the LSR instead of clarifying.	N/A	N/A	Field: ATN Entry: Existing number	Field: NTN Entry: New number
FID data on ACT of T	Workaround	When an LSR is processed for ACT of T, the FID data is not being populated on the service order.	N/A	N/A	Field: FA Entry: Varies	Field: S&E Entry: Varies

<i>Issue</i>	<i>Type</i>	<i>Procedure</i>	<i>Feature Number</i>	<i>Impl.</i>	<i>LSR</i>	<i>SO</i>
LTY	Workaround	When an LSR is submitted to change a listing the system shows the correct LTY inward action and also adds an outward action LTY.	N/A	N/A		
Wiring	Process	When jacks or wiring is done on premises by tech and is not on the LSR, the TECH calls the business unit and the Jacks and or wiring are added to the service order, but do not appear on the LSR.	N/A	N/A	Field: IWJK, IWJQ Entry: blank	Field S&E Entry: Various jack and wiring USOCs
PIC/LPIC BSLD Requests	Process	When LSRs are submitted with the PIC or LPIC of 0377, the representatives will change the PIC or LPIC to 0432 on the service order for billing purposes.	N/A	TBD	Field: PIC or LPIC Entry: 0377	Field: PIC or LPIC Entry: 0432
PKG	Process	When the FID PKG appears in the S&E section on a CSR and the account is being converted, BST removes the FID from the account during conversion activity.	N/A	N/A	Field: FA Entry: NONE	Field: S&E Entry: OPKG or C and T action coded the logical line USOC on which the FID is floated.

<i>Issue</i>	<i>Type</i>	<i>Procedure</i>	<i>Feature Number</i>	<i>Impl.</i>	<i>LSR</i>	<i>SO</i>
LUD	Process	When the FID LUD appears in the S&E section on a CSR and the account is being converted, BST removes the FID from the account during conversion activity.	N/A	N/A	Field: FA  Entry: NONE	Field: S&E  Entry: OLUD or C and T action coded the logical line USOC on which the FID is floated.

## CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2003, a copy of the foregoing document was served on the following parties, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
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